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Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

DEREK JOHNSON, personal representative of
KELLY CONRAD GREEN II, deceased;
KELLY CONRAD GREEN and SANDY
PULVER,

Plaintiffs,

v.

CORIZON HEALTH, INC., a Tennessee
Corporation; LANE COUNTY, an Oregon
county; DR. JUSTIN MONTOYA, an individual;
VICKI THOMAS, an individual; KIRSTIN
WHITE, an individual; and SHARON
EPPERSON (née FAGAN), an individual,

Defendants.

Civil Action No. 6:13-cv-01855-TC

**PLAINTIFFS' THIRD MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS**

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John T. Devlin, counsel for plaintiffs, has conferred with Adam Heder, counsel for the Corizon defendants, about this motion. The parties have been unable to resolve the dispute which is the basis of this motion.

Plaintiffs move for an Order compelling production of a two-page litigation history that Corizon recently provided to Lane County as part of an April 2015 proposal to keep the contract for medical and related services at the Lane County Jail. This motion is supported by the Memorandum in Support of Plaintiffs' Third Motion to Compel Production of Documents and the Declaration of John T. Devlin in Support of Plaintiff's Third Motion to Compel Production of Documents.

DATED this 26th day of May, 2015.

ROSENTHAL GREENE & DEVLIN, PC

/s/ John T. Devlin

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CERTIFICATE OF SERVICE

I hereby certify that I served true and correct copies of the foregoing:

1. PLAINTIFFS' THIRD MOTION TO COMPEL PRODUCTION OF DOCUMENTS

on the following:

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Of Attorneys for Corizon defendants.

Of Attorneys for Lane Co. defendant.

by the following method/s:

_____ mail with postage prepaid, deposited in the US mail at Portland, OR
 X service made via electronic mailing and/or CM/ECF filing
_____ hand delivery
_____ facsimile transmission
_____ overnight delivery.

Dated this 26th day of May, 2015.

/s/ John T. Devlin
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MICHAEL A. GREENE, OSB No. 802445
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Of Attorneys for Plaintiffs